Case 1:15-cv-09319-PAE Document 306

Filed 08

USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 8/28/2018

MDL No. 2074

Master Docket No.

No. 16 MD 2704 (PAE)

ECF Case

THIS DOCUMENT PERTAINS TO:

All Cases

STIPULATION AND [PROPOSED] ORDER AMENDING THE STIPULATED PROTECTIVE ORDER, THE STIPULATION AND ORDER REGARDING DISCOVERY RELATED TO TESTIFYING EXPERTS, AND THE STIPULATION AND ORDER REGARDING THE PRODUCTION OF DISCOVERY MATERIAL

WHEREAS, on November 14, 2017, the Court entered a Stipulated Protective Order (Dkt. No. 300) signed by all parties to the above-captioned consolidated proceedings ("the Action");

WHEREAS, on November 17, 2017, the Court entered a Stipulation and Order Regarding Discovery Related to Testifying Experts (Dkt. No. 304) signed by all parties to the Action;

WHEREAS, on December 18, 2017, the Court entered a Stipulation and Order Regarding the Production of Discovery Material (Dkt. No. 317) signed by all parties to the Action;

WHEREAS, on June 14, 2018, plaintiff trueEX LLC ("trueEX") filed an action (the "trueEX Action"), which on June 20, 2018 was accepted by the Court as "related" and consolidated into the Action; and

WHEREAS, the parties agree that trueEX should be added as signatory and Party to, and the trueEX Action should be covered by, the aforementioned stipulated Orders in the Action;

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED by and among counsel for Plaintiffs and Defendants that the Stipulated Protective Order (Dkt. No. 300), the Stipulation and Order Regarding Discovery Related to Testifying Experts (Dkt. No. 304), and the Stipulation and Order Regarding the Production of Discovery Material (Dkt. No. 317) are hereby amended to include trueEX as signatory and Party thereto; and the trueEX Action as part of the consolidated Action covered thereby. For the avoidance of doubt, all other terms of the three previously-entered orders (Dkt. Nos. 300, 304, 317) remain unchanged.

SO ORDERED.

Dated: ________, 2018

Hon. Paul A. Engelmayer
United States District Judge